1 HONORABLE ROBERT J. BRYAN 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 UNITED STATES OF AMERICA, Case No. 2:20-cy-203 RJB 10 Plaintiff, STIPULATION FOR MODIFICATION OF 11 v. MINUTE ORDER SETTING EXPERT TESTIMONY DISCLOSURE DEADLINE 12 KING COUNTY, WASHINGTON; DOW AND [PROPOSED] ORDER CONSTANTINE, in his official capacity as 13 King County Executive, **NOTE ON MOTION CALENDAR: OCTOBER 13, 2022** 14 Defendants. 15 **STIPULATION** 16 17 Plaintiff United States of America and Defendants King County and Dow Constantine 18 hereby stipulate, pursuant to Local Civil Rules 7(j) and 16(b)(6), as follows: 19 WHEREAS, the Parties continue to engage in active discovery, including document 20 production, depositions, and other discovery; 21 WHEREAS, the current deadline for the exchange of primary expert reports is October 14, 22 2022; 23 24 LAW OFFICES STIPULATION FOR MODIFICATION OF MINUTE ORDER 25 HARRIGAN LEYH FARMER & THOMSEN LLP SETTING EXPERT TESTIMONY DISCLOSURE DEADLINE 999 THIRD AVENUE, SUITE 4400 SEATTLE, WASHINGTON 98104 AND [PROPOSED] ORDER - 1 TEL (206) 623-1700 FAX (206) 623-8717 (Case No. 2:20-cv-203 RJB)

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WHEREAS, the Parties believe that it would be beneficial to extend the deadline for opening expert reports in order to allow the Court to consider Defendants' Motion to Modify Case Schedule filed contemporaneously with this Stipulation; and WHEREAS, certain documents required for expert disclosures have not yet been produced; NOW THEREFORE, the Parties, through their respective counsel of record, do hereby stipulate and agree on, and request that the Court adopt, the following revised schedule for disclosure of primary expert reports: The deadline for serving expert reports shall be modified from October 14, 2022 to the later of (a) seven days from the date that the Court rules on the County's Motion to Modify Case Schedule (but no earlier than October 28, 2022) or (b) the date set forth in any amended case schedule the Court issues after considering the County's motion. SO STIPULATED. Respectfully submitted this 13<sup>th</sup> day of October, 2022. NICHOLAS W. BROWN HARRIGAN LEYH FARMER & THOMSEN LLP United States Attorney By: *s/Timothy G. Leyh* By: s/Shane P. Cramer BRIAN M. BOYNTON By: s/Ariel Martinez Principal Deputy Assistant Attorney Timothy G. Leyh, WSBA #14853 General Shane P. Cramer, WSBA #35099 Ariel Martinez, WSBA #54869 ALEXANDER K. HAAS 999 Third Avenue, Suite 4400 Director Seattle, WA 98104 Tel: (206) 623-1700 JACQUELINE COLEMAN SNEAD Email: timl@harriganleyh.com Email: shanec@harriganleyh.com Assistant Branch Director Email: arielm@harriganleyh.com By: s/Michael J. Gerardi Michael J. Gerardi (D.C. Bar No. 1017949) By: s/Benjamin T. Takemoto Benjamin T. Takemoto (D.C. Bar No. 308075) United States Department of Justice LAW OFFICES STIPULATION FOR MODIFICATION OF MINUTE ORDER HARRIGAN LEYH FARMER & THOMSEN LLP SETTING EXPERT TESTIMONY DISCLOSURE DEADLINE 999 THIRD AVENUE, SUITE 4400 SEATTLE, WASHINGTON 98104 AND [PROPOSED] ORDER - 2

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STIPULATION FOR MODIFICATION OF MINUTE ORDER SETTING EXPERT TESTIMONY DISCLOSURE DEADLINE AND [PROPOSED] ORDER - 3 (Case No. 2:20-cv-203 RJB)

1 [PROPOSED] ORDER 2 This matter comes before the Court on the Parties' Stipulation for Modification of Minute 3 Order Setting Expert Testimony Disclosure Deadline, and good cause having been demonstrated, 4 the Court hereby orders that the deadline for serving expert reports shall be modified from 5 October 14, 2022 to the later of (a) seven days from the date that the Court rules on the County's 6 Motion to Modify Case Schedule (but no earlier than October 28, 2022) or (b) the date set forth in 7 any amended case schedule the Court issues after considering the County's motion. 8 IT IS SO ORDERED. 9 10 11 Robert J. Bryan 12 United States District Judge 13 Presented By: 14 NICHOLAS W. BROWN HARRIGAN LEYH FARMER & THOMSEN LLP United States Attorney 15 By: *s/Timothy G, Leyh* By: s/Shane P. Cramer BRIAN M. BOYNTON 16 By: *s/Ariel Martinez* Principal Deputy Assistant Attorney Timothy G. Leyh, WSBA #14853 General 17 Shane P. Cramer, WSBA #35099 Ariel Martinez, WSBA #54869 18 ALEXANDER K. HAAS 999 Third Avenue, Suite 4400 Director Seattle, WA 98104 19 Tel: (206) 623-1700 JACQUELINE COLEMAN SNEAD Email: timl@harriganleyh.com 20 Assistant Branch Director Email: shanec@harriganleyh.com Email: arielm@harriganleyh.com 21 By: s/Michael J. Gerardi Michael J. Gerardi (D.C. Bar No. 1017949) 22 By: s/Benjamin T. Takemoto Benjamin T. Takemoto 23 (D.C. Bar No. 308075) 24 LAW OFFICES STIPULATION FOR MODIFICATION OF MINUTE ORDER 25 HARRIGAN LEYH FARMER & THOMSEN LLP SETTING EXPERT TESTIMONY DISCLOSURE DEADLINE 999 THIRD AVENUE, SUITE 4400 SEATTLE, WASHINGTON 98104 AND [PROPOSED] ORDER - 4 TEL (206) 623-1700 FAX (206) 623-8717

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STIPULATION FOR MODIFICATION OF MINUTE ORDER SETTING EXPERT TESTIMONY DISCLOSURE DEADLINE AND [PROPOSED] ORDER - 5 (Case No. 2:20-cv-203 RJB)

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